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19 *Attorneys for Plaintiff,*  
20 *Sonia Feldman*

21 **UNITED STATES DISTRICT**  
22 **DISTRICT OF NEVADA**

23 SONIA FELDMAN,

24 Plaintiff,

25 v.

26 MARK ANTHONY SAWYER, ET AL,

27 Defendants.

Case Number: 2:24-cv-00526-JCM-MDC

**PLAINTIFF, SONIA FELDMAN'S  
NOTICE OF NON-COMPLIANCE  
WITH COURT'S ORDERS (DKT. 36)  
AND (DKT. 38)**

28 Plaintiff, Sonia Feldman, by and through her attorneys, respectively submits this notice of Defendants' non-compliance with this Court's Order (Dkt. 36), dated December 20, 2024, and with this Court's Order (Dkt. 38), dated March 7, 2025.

On December 20, 2024, this Court ordered at page 3, paragraphs 3 – 5 (Dkt. 36):

3. Non-corporate defendants (Mark Sawyer and Jennifer Sawyer) shall file either a notice of appearance of new counsel or a notice of intent to proceed pro se on or before **February 20, 2025**. (Bold emphasis in the original.)
4. The corporate defendants (all other defendants) shall file a notice of appearance of new counsel on or before **February 20, 2025**. (Bold emphasis in the original.)
5. Failure to timely comply with this order may result in sanctions, including a recommendation that this case be dismissed.

The defendant entities (i) MJS NEVADA TRUST; (ii) THE PROPERTY LOCATED AT 6508 Setting Moon Street, North Las Vegas, NV 89084-1258; (iii) ATD COMMERCE, LLC; (iv) ACM NORTH, LLC; (v) MAS HOLDINGS GROUP, and (vi) LLC; SAWYER HOLDINGS, LLC were all ordered to file a notice of appearance of new counsel, on or before February 20, 2025, two months after the order issued.

At page 3 of the Order (Dkt 36), these defendant entities were warned:

**DEFENDANT ENTITIES MUST RETAIN NEW COUNSEL**

Defendants are cautioned that in federal courts, corporate entities may only appear through licensed counsel. *United States v. High Country Broad. Co*, 3 F.3d 1244, 1245 (9th Cir. 1993). Therefore, the corporate defendants must retain counsel and file a notice of appearance by new counsel on or before February 20, 2025. Failure to do so will result in adverse consequences, including sanctions and judgment against such corporate defendants.” Order, page 3, lines 6-11.

The defendant entities were permitted two months to retain new counsel and file a notice of appearance. Approximately five months have passed, and the defendant entities have still not complied with the Court’s Order No. 36.

As this Court advised defendants, “A corporation may appear in federal court only through licensed counsel. *United States v. High Country Broad. Co*, 3 F.3d 1244, 1245 (9th Cir. 1993).

In *High Country*, the Ninth Circuit ruled, it “was perfectly appropriate” for the district

1 court to enter a default judgment against a defendant that failed to retain counsel after being ordered  
2 to do so. *Id.* Plaintiff requests that this Court do the same as the court in *High Country* and enter a  
3 default judgment against each of the corporate defendants.

4 Additionally, the non-corporate defendants, Mark Sawyer and Jennifer Sawyer) were  
5 ordered to file either a notice of appearance of new counsel or a notice of intent to proceed pro se  
6 on or before **February 20, 2025**. Again, approximately five months have passed since the issuance  
7 of the Court's Order 36, and the non-corporate defendants have refused to comply. Plaintiff  
8 therefore requests that judgment against the non-corporate defendants be entered as well.

9 Finally, after Plaintiff filed her motion for summary judgment (Dkt. 37) this Court issued  
10 a Minute Order in Chambers Regarding the Requirements of *Klinge v. Eikenberry* and *Rand v.*  
11 *Rowland*. The Court's Order 38 provided:

12 IT IS THEREFORE ORDERED that non-moving party or parties shall  
13 have 14 days, or 21 days for a motion for summary judgment, from the date  
14 of this Minute Order within which to file and serve points and authorities  
15 (and any other required documents) in opposition to the pending dispositive  
16 motion pursuant to the instructions herein, . . . (Order 38, page 3.)

17 Additionally, Fed. R. Civ. P. 16(f) provides: a district court "on motion or on its own, the  
18 court may issue any just orders, including those authorized by rule 37(b)(2)(A)(ii)-(vii), if a party  
19 or its attorney: . . .

20 (C) fails to obey a scheduling or other pretrial order.

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22  
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25 ///

26 ///

27 ///

1 Accordingly, Plaintiff Ms. Feldman requests this Court enter judgment in her favor  
2 against each defendant.

3 Respectfully submitted,

4 DATED this 22nd day of May 2025.

**ALBRIGHT STODDARD, WARNICK &  
ALBRIGHT**

6 //s// Kyle W. Fenton, Esq.  
7 G. MARK ALBRIGHT, ESQ. (1394)  
8 DANIEL R. ORMSBY, ESQ. (14595)  
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17 *Attorneys for Plaintiff,*  
18 *Sonia Feldman*

**CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b), I hereby certify that I am an employee of ALBRIGHT, STODDARD, WARNICK & ALBRIGHT and that on this 22nd day of May, 2025, service was made by the following mode/method a true and correct copy of the foregoing PLAINTIFF, SONIA FELDMAN'S NOTICE OF NON-COMPLIANCE WITH COURT'S ORDERS (DKT. 36) AND (DKT. 38) to the following person(s):

MARK ANTHONY SAWYER  
dba MAS Financing  
6940 N. Jensen Street  
Las Vegas, NV 89149-1365  
[Msawyer2729@yahoo.com](mailto:Msawyer2729@yahoo.com)  
*Defendant*

XX Certified Mail  
Electronic Filing/Service  
XX Email  
Facsimile  
Hand Delivery  
XX Regular Mail

JENNIFER SAWYER  
6940 N. Jensen Street  
Las Vegas, NV 89149-1365  
[Jen61002@hotmail.com](mailto:Jen61002@hotmail.com)  
*Defendant*

XX Certified Mail  
Electronic Filing/Service  
XX Email  
Facsimile  
Hand Delivery  
XX Regular Mail

MJS NEVADA TRUST  
6940 N. Jensen Street  
Las Vegas, NV 89149  
*Defendant*

XX Certified Mail  
Electronic Filing/Service  
Email  
Facsimile  
Hand Delivery  
XX Regular Mail

THE PROPERTY LOCATED AT  
6508 Setting Moon Street  
North Las Vegas, NV 89084-1258  
*Defendant*

XX Certified Mail  
Electronic Filing/Service  
Email  
Facsimile  
Hand Delivery  
XX Regular Mail

ATD COMMERCE, LLC  
C/O US Corporate Solutions, LLC  
2685 S. Rainbow Blvd., Ste. 213  
Las Vegas, NV 89146  
*Defendant*

XX Certified Mail  
Electronic Filing/Service  
Email  
Facsimile  
Hand Delivery  
XX Regular Mail

XX Certified Mail

1 ACM NORTH, LLC  
2 C/O US Corporate Solutions, LLC  
3 2685 S. Rainbow Blvd., Ste. 213  
4 Las Vegas, NV 89146  
5 *Defendant*

Electronic Filing/Service  
Email  
Facsimile  
Hand Delivery  
XX Regular Mail

4 MAS HOLDINGS GROUP, LLC  
5 C/O US Corporate Solutions, LLC  
6 2685 S. Rainbow Blvd., Ste. 213  
7 Las Vegas, NV 89146  
8 *Defendant*

XX Certified Mail  
Electronic Filing/Service  
Email  
Facsimile  
Hand Delivery  
XX Regular Mail

8 SAWYER HOLDINGS, LLC  
9 C/O Jeffrey Burr, LTD  
10 2600 Paseo Verde Pkwy., Suite 200  
11 Henderson, NV 89074  
12 *Defendant*

XX Certified Mail  
Electronic Filing/Service  
Email  
Facsimile  
Hand Delivery  
XX Regular Mail

15 /s/ Michelle Karony

16 An employee of Albright, Stoddard, Warnick &  
17 Albright